

Red Mesa High School

Teec Nos Pos, AZ. 86514
October 24, 2006

EPA
San Francisco, CA. 94105

Dear Mr. Baker,

A recent article in the Farmington Daily Times indicated a near deadline for public response. I have been a resident of the Navajo Reservation for fifteen years. I am currently employed at a school district which is only an hour away from the proposed Desert Rock power plant. I have seen the band of haze that crosses the desert near the Four Corners. I am against the construction of another coal-fired plant, and a nuclear – powered plant is questionable.

Without further information to the contrary, this is my vote. I remember the bitter thirty-year struggle to remove Peabody Coal Company from Black Mesa (also about an hour away) due to water-use issues mainly, and secondly, due to sacred site considerations. There were some issues with cattle drinking coal-blackened water. Unfortunately, we have been told very little, so we can only base our opinions on past experience. I used to drive through the “reclaimed area” on the mesa. Yes, the grass was growing, but not much else could be done with that area.

The people who live in the immediate vicinity of the Four Corners Power plant near Farmington, New Mexico, have had respiratory problems and their livestock have suffered as well. If one is to believe the signs posted by an irate farmer, the plant (there are actually two) is pumping TONS of mercury and other noxious chemicals into the air. President Bush’s legislation of a few years ago allowed the continued release of mercury and other heavy metals due to technical allowances such as energy credits and trading. Again, I do not have my fact sheet before me. I am hurrying to complete my general remarks by the deadline.

The illusion of distance out here is just that; the wind carries everything, and you should know that pollution doesn’t just disappear into the cosmos. The pressing need for jobs and the financial incentive to the tribe will probably outweigh other considerations. I just hope that the agencies whose job it is to protect the environment will do so, and not cave into corporate pressures. Of course the demand for energy has gone up; so, do the white folks plan to restore the rivers to their pre-colonial levels? I think not. What is needed is a sound national energy plan that reflects our higher values as well as our technical capabilities. As Father Thomas Berry pointed out in *Dawn Over the Earth*, “This planet is a one-time endowment...Every atom in the universe makes its presence known to every other atom...perhaps the trees were first and humans are derivative.”

Thank-you for reading my response.

Rebecca Reppert
English teacher

MAIN OBJECTION: water use will strain limited resources

Rebecca Reppert

Dorothy Redhorse

Sanostee, NM 87461

November 13, 2006

Mr. Robert T. Baker,
USEPA Region 9
75 Hawthorne Street
MAIL CODE: AIR-3
San Francisco, CA 94105

SUBJECT: AIR QUALITY PERMIT (DRAFT)

Dear Mr. Baker:

This letter is in response to the draft permit issued to the Dine Power Authority for proposed construction of the Desert Rock Power Plant on the Navajo Reservation in San Juan County, New Mexico. Please be advised that I have concerns about the draft permit issued for Desert Rock Power Plant due to quality of the air in the San Juan Basin due to numerous existing activities associated with energy development.

Being a resident of Little Water, San Juan County, New Mexico on the Navajo Reservation, I believe that the air quality is of less concern to the environmental agencies as well as public officials as the developers extract natural resources for energy development for the past three decades. For instance, the public is kept informed about quality of the air in the Bernalillo county with real time data so that they would take precautionary measure to improve air quality. However, we lack such air quality monitoring station in the San Juan Basin.

The air quality monitoring is essential in San Juan Basin for benefit of the public health. My children and I get asthma attacks. I am aware of the fact that numerous children and adults visit the emergency room in Shiprock, New Mexico due to respiratory problems. One person who used to work at the Emergency Room in Shiprock, NM told me that there were elevated levels of ambulatory visits for respiratory problems (asthma). When my friend changed place of employment from Shiprock, NM to Cortez, CO, he noticed that there are less visits for respiratory problems at the clinic in Montezuma County, Colorado. Thus, additional assessment should be conducted for health problems associated with energy development especially there are two coal fired power plants and many gas wells within the San Juan Basin. I am concerned about wellness of children and adults who live in the surrounding areas..

Furthermore, I am concerned about issuance of draft permit to the Dine Power Authority for the construction of the Desert Rock Power Plant in rural San Juan County on the Navajo Reservation when the paper work was handled by the Navajo Nation Environmental Protection Agency. This information was provided by Mr. Nathan Plagens of the Site Global when he verbally expressed

his appreciative for the work administered by Mr. Stephen B. Etsitty of the NNEPA during the Navajo Nation Environmental Protection Agency conference in April 2006. I believed it would be proper for the developer to initiate the paper work for when applying for air quality permit(s). The NNEPA should have remained impartial during the processing of paper work. I believe this created conflict of interest on part of the NNEPA as this agency is assumed responsibility to regulate and enforce the environmental regulations set forth by the Congress.

In addition, the draft permit was issued before the developer even produced the environmental impact assessment for the proposed location despite lack of approval of the proposed site by the Bureau of Indian Affairs. In fact, the draft environmental impact statement is being kept confidential until it is finalized in December for public review.

Lastly, the aesthetic value should be kept as a factor as we see yellow to brown haze across the horizon every day. There are days when the haze is so bad that visibility is probably no more than thirty miles. The day when Four Corners Power Plant went down, the visibility was great. My husband has that digital photo of the site north of Burnham and he has it as his screen saver on his computer. The loss of power from the Four Corners Power Plant shut down yield no panic from the power regulators or users in the west so having another coal fired power plant in the San Juan Basin is not vital for all mankind.

I am concern about future generations yet to come as we are obligated to leave the earth for them as they have a right to have clean air, water, and land. In addition, the local residents of Little Water and Sanostee have a right to have clean air, water, and land. With that, please reconsider the current draft permit and any other permits to be issued to the developer for energy development on the Navajo Reservation despite the proposed power plant being listed on the US National Energy Policy Act of 2005. The Navajo People have been impacted and suffered enough from past energy and nuclear energy developments and we do not need anymore detrimental effects from large-scale energy development. Thank you.

Respectfully,



Dorothy Barber-Redhorse
Resident of Little Water

/dbr

xc: file

I will be brief and to the point. I am concerned and opposed to the Desert Rock Coal Fired Power plant on the grounds of air and water pollution, the misuse of public trust, and lack of cooperation. It is my perception that the EPA is biased in favor of the project.

It is my understanding that the background monitors were not done in areas where the air pollution is destined to blow i.e. Cortez Co, Durango, and adjacent areas. We already experience air pollution from the existing power plants of the same nature. Desert Rock has indicated that 85% of the emissions will be recaptured. 15% of the huge amount of emissions is too much for an area that is already experiencing too much pollution. It is already established by the air quality statistics at Mesa Verde and other areas that the pollution has exceeded acceptable levels. Why has the EPA not done anything about the existing plants that are emitting vastly excessive amounts of pollution? Why has Sithe Global Energy not taken responsibility for helping to improve the air quality prior to adding to the problem? This sort of lack of initiative and responsibility indicates to me that they are not in the least bit committed to making this an environmentally acceptable project.

The EPA seems to be overlooking pollution problems including air, water and contribution to global warming issues. The Clean Air Mercury Rule of 2005 requires that the EPA reduce and permanently limit emissions. The addition of yet another coal fired plant in this area can't possibly be in compliance with that goal.

The site of the Desert Rock Project is in an area populated by a low income minority. Bringing in jobs is a great idea but these are dirty, unhealthy jobs that will cause even further destruction to this population and not the greatly needed benefit of improved quality of life. They will not even benefit from the production of the energy created here. Why should this area suffer the consequences of a polluting, destructive project to enhance the energy consumption of other states? Do you really think this is ethical? I do not.

It is absolutely **HEARTBREAKING** to see the yellow, smoggy air pollution settle in the sky over Cortez. I can't believe that you will allow a project that is without a doubt going to further add to the deterioration of environmental quality in this area.

Nancy Lynn
Mancos, Co.

There seems to be no point in getting real technical here on pollution issues in general or more specifically concerns over the Desert Rock Coal Burner your agency seems to be supporting since your agency isn't being very technical. So let's just start right out by saying the EPA stinks. What exactly do those initials stand for? Extra Power Assignments? You are a real sick joke. Isn't your job to reduce emissions? Another coal plant is not the answer. At the very least you could attempt to control it not increase it by closing an existing plant for a more efficient one. Cumulative air quality impacts are not being considered here. I don't believe they are being properly monitored here to the north by your agency. Ask Mesa Verde Park about the decline in visibility. Never mind they are also a federally funded agency. But wait just a minute. Isn't Mesa Verde a world heritage center whatever that means? Well then shouldn't we be asking the rest of the world what they think about the EPA's standards and how they feel about our contributions to global warming. They may have a vested interest. Can't we turn this over to a higher power than the EPA? I'd also be interested in knowing about how they feel about another great deal we are offering to our beloved native Americans here with this power plant in their sacred back yard. Oh well, thank God, at least it is not in ours. I don't think that we would stand for this off reservation. And it really shouldn't be allowed on the reservation either. There are far better alternatives for energy.

Dave Lipe
Mesa, CO.

Jennifer Stengel

Durango, CO 81301
October 25, 2006

Air-3
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

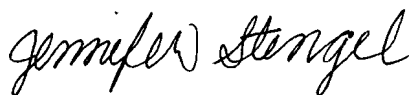
Dear Mr. Baker:

I am writing to express my concern and opinion about the proposed Desert Rock power plant. The proposed site is not far from Durango, my hometown. Recently, it has been brought to my attention that the Environmental Protection Agency has issued a proposed Clean Air Act Prevention of Significant Deterioration permit to Sithe Global Energy, the company constructing the plant. I believe it to be both unusual and illogical for the EPA to seek comment on the PSD prior to the Bureau of Indian Affairs' release of the Environmental Impact Statement. I am concerned about the condition of air, water, soil, and quality of life in the area and am urging the EPA to postpone issuance of a permit until the EIS process has been thoroughly completed.

Further, it is my hope that the EPA seriously consider all technical options for the proposed facility that afford the best, cleanest, and most modern control technology available to such a facility in both its design and operations. I understand that the merits of the integrated-gasification-combined-cycle design, used elsewhere in the U.S., are superior to the supercritical pulverized coal-fired boilers already proposed in Desert Rocks' design. Although I am no expert on these matters, these considerations seem to make sense for the environment and for all of us sharing the planet. I am urging the EPA to adopt only agreements with Sithe that are legally binding and enforceable.

Our two major industries in the area, agriculture and tourism, depend largely on the health and vigor of our environment. Research exists that links nitrous oxide and sulfur dioxide emitted by power plants with agricultural concerns. This past summer, several lakes in the area were adversely affected by higher than acceptable levels of mercury. I understand that one way to hold the new plant to its promises of reducing mercury emissions by 90% would be through sufficient monitoring, to be paid for by the plant. Clean air and water should be of concern to all of us sharing the planet, as should be the idea of Desert Rock setting an example for others with its state-of-the-art technology for minimal environmental impact. I believe there exists the opportunity to build a plant that treats the environment more kindly, and trust that the EPA will do everything within its power to back the building of such a facility. Thank you for your time and commitment to a greener planet.

Respectfully,


Jennifer Stengel

XI-85

Jamie Stephens

Dolores, CO 81323

September 23, 2006

Robert Baker (AIR-3)
EPA, Region 9
75 Hawthorn Street
San Francisco, CA 94105

Dear Robert Baker,

I am writing concerning the proposed Desert Rock power plant on the Navajo Nation in New Mexico. I live in southwest Colorado where the high desert meets the Rocky Mountains and have made my home here for over 30 years. I grew up in Southern California and left there in 1972 because I needed to live someplace where I could breathe, rather than see the air. The view from my home near Dolores is towards Mesa Verde, the Sleeping Ute Mountain, and beyond to the mountains of the Four Corners region of New Mexico and Arizona.

Over the last few years, the air quality here has worsened dramatically. At times the mountains we used to see are almost obliterated by a yellow/brown haze, much too similar to the California of my youth. This haze (smog) is a result of the coal-fired power plants we already have in our area. We do not get our power from those plants nor will we get power from the proposed Desert Rock power plant. We only get the emissions. The enclosed letter from the Citizens for Accountability and Responsibility discusses the problems associated with these emissions. We don't have the benefits of ocean breezes here, as you have in San Francisco. Our prevailing winds come precisely from the Four Corners region.

Please consider the health and well being of the thousands of people living here who will not benefit from the power produced but will suffer directly from its production.

Isn't it time to develop renewable energy sources, such as solar power? We have hundreds of sunny days a year here. Will your conscience allow you to ignore the consequences of antiquated power production? Can't we learn from the experiences of the Europeans who have already decimated their forests and polluted their water sources with coal-fired power plant emissions?

Please re-read the enclosed letter.

How can a Clean Air Act permit and a coal-fired power plant be mentioned in the same sentence?

I am opposed to the construction of the Desert Rock power plant.

Thank you for your time.

Sincerely,

Jamie Stephens

Jamie Stephens

CFAR opposes Desert Rock power plant

Editor's Note: The following letter was sent to the Environmental Protection Agency by Citizens for Accountability and Responsibility. To comment by Oct. 27, e-mail desertrockairpermit@epa.gov, fax (415) 947-3579, write Robert Baker, Air-3, U.S. EPA, 75 Hawthorne St., San Francisco, CA 94105 or in person from 1 to 5 p.m. or from 6 to 9 p.m. Oct. 4 at the Shiprock High School auditorium.

Dear Mr. Baker,

I am writing to you on behalf of Citizens for Accountability and Responsibility, an organization of more than 60 residents in Montezuma County. We oppose the sanctioning of the Desert Rock Power Plant. The questionable reputation of the Sithe group coupled with the testimony of an employee of another plant in the area stating that scrubbers were removed at night and the lack of regular inspection is just one factor in our

opposition. The once pure blue sky beyond Cortez is now constantly hazy. Even though, supposedly, the "best available control technology" is proposed, we cannot condone any additional environmental pollutants considering the cumulative emissions of all the plants in that area.

In your mailing, no mention was made of control of airborne mercury emissions. Much of the electricity generated in the four corners area goes to states other than Colorado, yet in the past few years the official values for mercury concentration in precipitation water at Mesa Verde measured the second highest in the nation. Fish in McPhee and Narraguinne reservoirs have the highest concentrations of mercury of any bodies of water in the state. The Colorado Department of Health and Environment has identified the sources: airborne mercury from the San Juan and Four Corners

generating plants.

High doses of mercury cause retardation, neuromuscular dysfunction and death. Smaller doses, just 58 parts per billion can affect neuromuscular function and pose a high risk to fetuses. According to the National Academy of Science, more than 60,000 children born each year may suffer learning disabilities due to mercury exposure before birth.

Recent studies at Johns Hopkins have shown the linkage of mercury to heart attacks and coronary disease. The Washington Post reported research stating that 23,600 deaths each year are due to pollution from power plants. New Mexico has more than double the national average of mercury emissions, and most of that comes from the two plants in the Farmington area. Research there has shown that one in 12 women in New Mexico have so much mercury in their

system that if they were to become pregnant, their children would be highly likely to suffer permanent brain damage.

Airborne mercury movement is dependent upon prevailing winds and topography. We in Montezuma County are getting it in our reservoirs, our crops, our livestock feed and the air we breathe. Condoning the construction of more coal fired power plants with still imperfect emission control technologies and which, by the way, can and have been bypassed for greater efficiency, will significantly threaten our lives, the lives of our children, our reservoirs, agriculture and cattle.

We urge you to investigate and reconsider your approval.

Sincerely,

Pat Kantor

CFAR President

NATIONAL GEOGRAPHIC
GRAND

Places We Must Save

WORLD PARKS AT RISK 42

AMERICA'S THREATENED SANCTUARIES 68

PARIS: SPACE FOR THE SOUL 98

PLUS SPECIAL U.S. MAP SUPPLEMENT

The Chemicals Within Us 116 Mexico's Pyramid of Death 144

II-86



United States
Environmental Protection
Agency

Mr. Robert Baker
Air Division (Air-3)
USEPA Region 9
75 Hawthorne St.
San Francisco, CA 94105

Public Comment Form

(Please Print)

Name MARK STETZ

Address 3 AVE
DURANGO, CO 81301

Affiliation CITIZEN

Telephone 970.

Email MSTETZ@TWCsedge.com

Would you like to be added to our mailing list? ☒ Yes ☐ No

Comments: NO COMMENTS. STILL
LEARNING ABOUT
PLANT + PERMIT PROCESS

Durango, CO 81302

16 November 2006

US Environmental Protection Agency
Region 9
75 Hawthorne Street
San Francisco, CA 94105

Greetings:

I strongly oppose the construction of the proposed Desert Rock Energy Facility to be built thirty miles south of Shiprock, New Mexico. I live in Durango, and teach for the public schools in Aztec, NM. We are down wind from this site and would be impacted by pollution from this proposed power plant if it is built. There is pristine wilderness in the mountains of northern New Mexico including the Sangre de Cristo Mountains that would be affected.

I have lived and taught in the Four Corners area on and off since 1969 and have seen air quality degraded from the existing coal-fired powerplants. When I was a ranger at Mesa Verde National Park in 1969, 1970 and 1981, I saw the landmark of Shiprock itself disappear into the brown haze that continues today.

Before the EPA considers the approval of another coal-fired power plant in our area, you should require the existing facilities like the Fruitland plant conform to more stringent standards of air quality. We already have seen higher levels of mercury and other heavy metals in local reservoirs such as Vallaceto Reservoir north of Bayfield, CO. Sulfur dioxide pollution can cause acid rain for hundreds of miles downwind and damage crops and buildings as far away as Oklahoma and Arkansas.

Again, I strongly oppose the construction of this new power plant unless it is built to the very highest standards of pollution control technology. I realize the need for electric power and jobs on the Navajo Reservation, but we need to do a better job of containing pollution than in the past. Do not make those of us in the Four Corners area suffer degrading air quality for the sake of people in far-away cities.

Sincerely Yours,



Stephen W. Studebaker

VI-88

10/2/06

Robert Baker, Attn -3
U.S. Environmental Protection Agency
75 Hawthorne St.
San Francisco, CA 94105

proposed:
Re: Desert Rock coal-fired
power plant

Dear Mr. Baker,

As a resident in Las Vegas, NV, I'm very concerned about the pollution levels increasing in the area where we already have two major polluting power plants.

I am also appalled that the public comment period will end before the draft EIS is released?!

The effects of increased mercury, sulfur dioxide & nitrogen oxides may be subtle (or not) to our land, water, air & mammals (including us) - but already one can easily see the effect of the current plants on visibility. And there have been mercury advisories in our area. Additionally w/ the current acceptance from most scientists & people affected by it, - CO₂ ~~emissions~~ emissions causing global warming is a reality. Why would the EPA approve contributing to that?

I'm not clear how all the air quality effects were evaluated, modeled & cumulative effects considered, as well as non-stationary effects.

It would seem that our area already has

a disproportionate exposure to health problems.
from the existing power plants. Therefore Executive
Order 12898 regarding environmental justice
likely applies.

The statistics given of "expected 20 reduction"
for air pollution may read ~~well~~ ^{well} - but if
you lived here — how much additional
poison in the air, water & ground would
you accept?

Sincerely,

Louise TEAL

7

Duango, Co. 81302

XI-89

10/25/06

Dear Sir,

The proposed Desert Rock
Power plant does not
address all its known
environmental health
hazards, and should
not be permitted to
move forward until
all have been addressed
with state-of-the-science
solutions!

R. E. H.